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February 12, 2013

By Electronic Filing

The Honorable Dennis M. Cavanaugh
United States Judge
District Court for New Jersey
Martin Luther King, Jr. Federal Building & Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. Crusader Servicing Corporation
Criminal Action No. 02:12-cr-644-DMC

Dear Judge Cavanaugh:

Enclosed please find a courtesy copy of a proposed Consent Order I filed today on behalf of my client, Crusader Servicing Corporation (“Crusader”), and the United States Department of Justice (“DOJ”). The need for this Consent Order arose when Crusader was unable to complete the sale of certain properties because the judgment in the above-referenced case appeared in title searches as a lien and/or encumbrance. As I explained during the sentencing hearing, Crusader’s financial condition is tenuous, and its only hope of paying off the fine in this case is through its sale of real property owned.

I would respectfully ask that the Court treat this matter as expeditiously as possible given Crusader’s financial situation. Already, two sales of property have been postponed, and there are a number of sales scheduled in the coming weeks.

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I have been instructed by Charles Reilly of the Antitrust Division that I can represent to the Court that the DOJ joins in this motion.

Respectfully submitted,


Colm F. Connolly

CFC/lmg
Enclosure
c: Charles Reilly, Esq.